

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

VINSON & ELKINS LLP

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Counsel for the Ad Hoc Customer Group

In re:

Powin, LLC, *et al.*,¹

Debtors.

Case No. 25 – 16137 (MBK)

Chapter 11

(Jointly Administered)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin, LLC [0504], (ii) PEOS Holdings, LLC [5476], (iii) Powin Project LLC [1583], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

ADJOURNMENT REQUEST

1. I, Lauren R. Kanzer,

☒ am the attorney for: Lone Star Solar, LLC, Idaho Power Company, West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC (collectively, the “***Ad Hoc Customer Group***”)

☐ am self-represented,

and request an adjournment of the following hearing for the reason set forth below.

Matters:

Notice of Motion for Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief [Docket No. 297] (“***Adequate Protection Motion***”); and

Notice of Motion for Entry of an Order Authorizing Ad Hoc Customer Group to Redact and File Under Seal Confidential Information Contained in Exhibits in Connection with Ad Hoc Customer Group’s Declarations and Witness and Exhibit List [Docket No. 339] (“***Motion to Seal***”).

Current hearing date and time: July 15, 2025 at 11:30 A.M. (ET)

New date requested: August 6, 2025 at 11:30 A.M. (ET)

Reason for adjournment request:

The parties have agreed to adjourn the hearing on (i) the *Omnibus Motion of the Debtors For Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief* [Docket No. 88] (the “***Rejection Motion***”) and (ii) the *Limited Objection and Reservation of Rights of Ad Hoc Customer Group to Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief* [Docket No. 296] (the “***Objection***”) to August 6, 2025 (the next Omnibus Hearing Date). The Adequate Protection Motion and related Motion to Seal raise issues of fact and law that correspond to the issues of fact and law raised in both the Rejection Motion and the Objection. For purposes of judicial economy and efficiency, the Ad Hoc Customer Group requests that the hearing on the Adequate Protection Motion and Motion to Seal be heard at the hearing to consider the Rejection Motion and the Objection.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

Dated: July 14, 2025
New York, New York

Respectfully submitted,

/s/ Lauren R. Kanzer

VINSON & ELKINS LLP

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Counsel for the Ad Hoc Customer Group

COURT USE ONLY:

The request for adjournment is:

- | | | |
|--|--|-------------------------------------|
| <input checked="" type="checkbox"/> Granted | New Hearing Date <u>8/6/2025 at 11:30 am</u> | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Granted over objection(s) | New Hearing Date _____ | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Denied | | |

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.